

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

MERCY HOSPITAL, IOWA CITY, IOWA, *et al.*,

Debtors.

)
) Chapter 11
)
) Case No. 23-00623 (TJC)
)
) Jointly Administered
)
)

**NOTICE OF DEBTORS' FIRST OMNIBUS MOTION FOR ENTRY OF ORDER (I)
AUTHORIZING DEBTORS TO ASSUME MULTIPLE EXECUTORY CONTRACTS
PURSUANT TO BANKRUPTCY RULE 6006(E), (II) AUTHORIZING THE DEBTORS
TO ASSUME THE EXECUTORY CONTRACTS ON THE ASSUMED CONTRACTS
LIST, AND (III) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on May 15, 2024 Mercy Hospital, Iowa City, Iowa ("Mercy") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "Debtors") filed *Debtors' First Omnibus Motion for Entry of Order (I) Authorizing Debtors to Assume Multiple Executory Contracts Pursuant to Bankruptcy Rule 6006(E), (II) Authorizing the Debtors to Assume the Executory Contracts on the Assumed Contracts List, and (III) Granting Related Relief* (the "Assumption Motion").

PLEASE TAKE FURTHER NOTICE that the Assumption Motion seeks to assume certain of the Debtors' executory contracts. Parties receiving this Notice and the Assumption Motion should review Exhibit B to the Assumption Motion to determine whether their contract(s) are set forth in the Assumption Motion.

PLEASE TAKE FURTHER NOTICE that objections to the Assumption Motion must be filed with the Clerk and served on the United States Trustee and Debtors' attorneys by no later than **Thursday, June 6, 2024**.

PLEASE TAKE FURTHER NOTICE that if any objections are received to the Assumption Motion, a hearing will be set by separate order or notice to consider such objections.

[Remainder of Page Intentionally Left Blank]

Dated: Cedar Rapids, Iowa
May 15, 2024

NYEMASTER GOODE, P.C.

/s/ Roy Leaf

Roy Leaf, AT0014486
625 First Street SE, Suite 400
Cedar Rapids, IA 52401-2030
Telephone: (319) 286-7002
Facsimile: (319) 286-7050
Email: rleaf@nyemaster.com

- and -

Kristina M. Stanger, AT0000255
Matthew A. McGuire, AT0011932
Dana Hempy, AT0014934
700 Walnut, Suite 1600
Des Moines, IA 50309
Telephone: 515-283-3100
Fax: 515-283-8045
Email: mmcguire@nyemaster.com
kmstanger@nyemaster.com
dhempy@nyemaster.com

- and -

MCDERMOTT WILL & EMERY LLP

Felicia Gerber Perlman (admitted *pro hac vice*)
Daniel M. Simon (admitted *pro hac vice*)
Emily C. Keil (admitted *pro hac vice*)
444 West Lake Street, Suite 4000
Chicago, IL 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: fperlman@mwe.com
dsimon@mwe.com
ekeil@mwe.com

- and -

Jack G. Haake (admitted *pro hac vice*)
2501 North Harwood Street, Suite 1900
Dallas, TX 75201
Telephone: (214) 295-8000
Facsimile: (972) 232-3098
Email: jhaake@mwe.com

Counsel for Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

The undersigned certifies, under penalty of perjury, that on this May 15, 2024, the foregoing document was electronically filed with the Clerk of Court using the Northern District of Iowa CM/ECF and the document was served electronically through the CM/ECF system to the parties of the Chapter 11 Cases.

/s/ Roy Leaf